

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**Case No. 3:23-cv-3071  
MDL No. 3071**

This document relates to:

**Case No. 3:23-cv-410**

Hon. Waverly D. Crenshaw

**DEFENDANT KAIROI MANAGEMENT, LLC'S  
ANSWER AND DEFENSES TO PLAINTIFFS'  
CONSOLIDATED SECOND AMENDED  
ANTITRUST CLASS ACTION COMPLAINT**

Under Federal Rules of Civil Procedure 7 and 8, Defendant Kairoi Management, LLC, answers Plaintiffs' Consolidated Second Amended Class Action Complaint, ECF No. 530 ("Complaint"), as follows:

## **PRELIMINARY STATEMENT**

Except as specifically admitted, Kairoi denies the allegations in the Complaint. Unless otherwise noted, all references to a specified paragraph refer to the numbered paragraphs in the Complaint. Kairoi does not by noting or admitting that the Complaint references a particular document or source admit the truth of any assertion in the referenced document or source, or admit that Plaintiffs have accurately quoted from or characterized the document or source. Headings and footnotes contained within the Complaint are not substantive allegations to which an answer is required. To the extent headings are substantive allegations to which an answer is required, Kairoi denies the allegations. (Kairoi has included the headings contained in the Complaint for reference, but neither adopts nor admits them.) To the extent footnotes in the Complaint are deemed to be substantive allegations, then the response to the paragraph in which the footnote is found is Kairoi's response to the footnote as well.

Any factual averment that is admitted below is admitted only as to Kairoi and only as to the specific facts stated therein and not as to any conclusions, legal or otherwise, characterizations, implications, or speculation in the averment or the Complaint as a whole. To the extent that an averment includes a mix of alleged factual assertion and legal conclusion, Kairoi denies such commingled allegations except those that are specifically admitted. On those occasions in the Complaint when Plaintiffs make allegations against all Defendants, unless otherwise noted in this Answer, Kairoi answers for itself only, and any allegations directed against other Defendants will be denied. Kairoi incorporates this statement by reference into its response to any paragraph in the Complaint that makes allegations against Defendants collectively.

In response to Plaintiffs' opening, unnumbered paragraph in the Complaint, Kairoi admits only that Plaintiffs have filed suit against a number of Defendants, including Kairoi. Kairoi denies that Kairoi is liable to Plaintiffs and denies that Plaintiffs are entitled to any relief.

## **ANSWER**

Kairoi responds to the Complaint's separately numbered paragraphs as follows:

### **INTRODUCTION**

1. The allegations in Paragraph 1 contain legal conclusions to which no response is required. To the extent a response is required and Paragraph 1 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 1 as to any person or company other than Kairoi and therefore denies those allegations.

2. To the extent Paragraph 2 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 2 as to any person or company other than Kairoi and therefore denies those allegations.

3. To the extent Paragraph 3 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 3 and therefore denies the allegations.

4. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 4 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 4 as to any person or company other than Kairoi and therefore denies those allegations.

5. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 5 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 5 as to any person or company other than Kairoi and therefore denies those allegations.

6. To the extent Paragraph 6 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 6 as to any person or company other than Kairoi and therefore denies those allegations.

7. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 7 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 7 as to any person or company other than Kairoi and therefore denies those allegations.

8. To the extent Paragraph 8 includes allegations about Kairoi, Kairoi denies the allegations. The allegations in Paragraph 8 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

## I. BACKGROUND

9. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 9 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 9 as to any person or company other than Kairoi and therefore denies those allegations.

10. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 10 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 10 as to any person or company other than Kairoi and therefore denies those allegations.

11. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 11 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 11 as to any person or company other than Kairoi and therefore denies those allegations.

12. To the extent Paragraph 12 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi lacks information or knowledge sufficient to form a belief as to what “witness[es]” said to plaintiffs’ counsel, and on that basis denies the allegations related to “witness interviews. Kairoi denies the remaining allegations in Paragraph 12.

13. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 13 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 13 as to any person or company other than Kairoi and therefore denies those allegations.

14. To the extent Paragraph 14 includes allegations about Kairoi, Kairoi admits that RealPage charges certain fees for the use of its software, but denies the remaining allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 14 as to any person or company other than Kairoi and therefore denies those allegations.

15. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 15 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 15 as to any person or company other than Kairoi and therefore denies those allegations.

16. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 16 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 16 as to any person or company other than Kairoi and therefore denies those allegations.

17. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 17 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 17 as to any person or company other than Kairoi and therefore denies those allegations.

18. Kairoi lacks information or knowledge sufficient to form a belief as to what “witness[es]” said to plaintiffs’ counsel, and on that basis denies the allegations related to “witnesses.” Kairoi denies the remaining allegations in Paragraph 18.

19. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 19 and therefore denies the allegations.

20. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 20 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 20 as to any person or company other than Kairoi and therefore denies those allegations.

21. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 21 includes allegations about Kairoi, Kairoi denies the allegations, including the allegations in Figure 1. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 21 as to any person or company other than Kairoi and therefore denies those allegations.

22. To the extent Paragraph 22 includes allegations about Kairoi, Kairoi denies the allegations, including the allegations in Figure 22. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 22 as to any person or company other than Kairoi and therefore denies those allegations.

23. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 23 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 23 as to any person or company other than Kairoi and therefore denies those allegations.

24. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 24 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 24 as to any person or company other than Kairoi and therefore denies those allegations.

25. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 25 and therefore denies the allegations.

26. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 26 and therefore denies the allegations.

27. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 27 and therefore denies the allegations.

28. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 28 and therefore denies the allegations.

29. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 29 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 29 as to any person or company other than Kairoi and therefore denies those allegations.

30. Kairoi denies the allegations in Paragraph 30.

31. To the extent Paragraph 31 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 31 as to any person or company other than Kairoi and therefore denies those allegations.

32. Kairoi denies the allegations in Paragraph 32 .

33. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 33 and therefore denies the allegations.

34. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 34, including in Figures 3 and 4, and therefore denies the allegations.

35. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 35 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 35 as to any person or company other than Kairoi and therefore denies those allegations.

36. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 36 and therefore denies the allegations.

37. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 37 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 37 as to any person or company other than Kairoi and therefore denies those allegations.

38. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 38 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 38 as to any person or company other than Kairoi and therefore denies those allegations.

39. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 39 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 39 as to any person or company other than Kairoi and therefore denies those allegations.

40. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 40 requires a response and includes allegations related to Kairoi, Kairoi denies the characterization of the source and the remaining allegations in Paragraph 40. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 40 as to any person or company other than Kairoi and therefore denies those allegations.

41. To the extent Paragraph 41 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 41 as to any person or company other than Kairoi and therefore denies those allegations.

42. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 42 and therefore denies them.

43. Paragraph 43 contains a legal conclusion to which no response is required. To the extent a response is required, and to the extent Paragraph 43 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 43 as to any person or company other than Kairoi and therefore denies the allegations.

## **II. JURISDICTION AND VENUE**

44. Paragraph 44 contains a legal conclusion to which no response is required. To the extent a response is required, Kairoi admits that Plaintiffs purport to bring this action under Sections 4 and 16 of the Clayton Act (15 U.S.C. §§ 15 and 26) and Section 1 of the Sherman Act (15 U.S.C. § 1), but denies that Kairoi has committed any unlawful conduct and denies that Plaintiffs are entitled to any relief against Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 44 as to any person or company other than Kairoi and therefore denies those allegations.

45. The allegations in Paragraph 45 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi admits the Court has subject matter jurisdiction over this action.

46. The allegations in Paragraph 46 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi admits that the Judicial Panel on Multidistrict Litigation transferred related actions to this District for pretrial proceedings. Kairoi denies the remaining allegations in Paragraph 46.

47. The allegations in Paragraph 47 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations in Paragraph 47 to the extent that they includes allegations about Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 47 as to any person or company other than Kairoi and therefore denies those allegations.

48. The allegations in Paragraph 48 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

49. Paragraph 49 calls for a legal conclusion, to which no response is required. To the extent a response is required, Kairoi admits that the Judicial Panel on Multidistrict Litigation transferred related actions to this District for pretrial proceedings.

### **III. THE PARTIES**

50. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 50 and therefore denies the allegations.

51. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 51 and therefore denies the allegations.

52. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 52 and therefore denies the allegations.

53. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 53 and therefore denies the allegations.

54. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 54 and therefore denies the allegations.

55. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 55 and therefore denies the allegations.

56. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 56 and therefore denies the allegations.

57. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 57 and therefore denies the allegations.

58. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 58 and therefore denies the allegations.

59. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 59 and therefore denies the allegations.

60. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 60 and therefore denies the allegations.

61. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 61 and therefore denies the allegations.

62. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 62 and therefore denies the allegations.

63. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 63 and therefore denies the allegations.

64. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 64 and therefore denies the allegations.

65. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 65 and therefore denies the allegations.

66. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 66 and therefore denies the allegations.

67. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 67 and therefore denies the allegations.

68. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 68 and therefore denies the allegations.

69. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 69 and therefore denies the allegations.

70. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 70 and therefore denies the allegations.

71. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 71 and therefore denies the allegations.

72. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 72 and therefore denies the allegations.

73. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 73 and therefore denies the allegations.

74. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 74 and therefore denies the allegations.

75. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 75 and therefore denies the allegations.

76. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 76 and therefore denies the allegations.

77. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 77 and therefore denies the allegations.

78. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 78 and therefore denies the allegations.

79. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 79 and therefore denies the allegations.

80. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 80 and therefore denies the allegations.

81. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 81 and therefore denies the allegations.

82. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 82 and therefore denies the allegations.

83. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 83 and therefore denies the allegations.

84. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 84 and therefore denies the allegations.

85. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 85 and therefore denies the allegations.

86. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 86 and therefore denies the allegations.

87. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 87 and therefore denies the allegations.

88. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 88 and therefore denies the allegations.

89. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 89 and therefore denies the allegations.

90. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 90 and therefore denies the allegations.

91. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 91 and therefore denies the allegations.

92. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 92 and therefore denies the allegations.

93. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 93 and therefore denies the allegations.

94. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 94 and therefore denies the allegations.

95. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 95 and therefore denies the allegations.

96. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 96 and therefore denies the allegations.

97. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 97 and therefore denies the allegations.

98. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 98 and therefore denies the allegations.

99. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 99 and therefore denies the allegations.

100. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 100 and therefore denies the allegations.

101. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 101 and therefore denies the allegations.

102. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 102 and therefore denies the allegations.

103. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 103 and therefore denies the allegations.

104. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 104 and therefore denies the allegations.

105. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 105 and therefore denies the allegations.

106. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 106 and therefore denies the allegations.

107. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 107 and therefore denies the allegations.

108. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 108 and therefore denies the allegations.

109. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 109 and therefore denies the allegations.

110. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 110 and therefore denies the allegations.

111. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 111 and therefore denies the allegations.

112. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 112 and therefore denies the allegations.

113. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 113 and therefore denies the allegations.

114. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 114 and therefore denies the allegations.

115. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 115 and therefore denies the allegations.

116. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 116 and therefore denies the allegations.

117. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 117 and therefore denies the allegations.

118. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 118 and therefore denies the allegations.

119. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 119 and therefore denies the allegations.

120. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 120 and therefore denies the allegations.

121. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 121 and therefore denies the allegations.

122. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 122 and therefore denies the allegations.

123. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 123 and therefore denies the allegations.

124. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 124 and therefore denies the allegations.

125. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 125 and therefore denies the allegations.

126. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 126 and therefore denies the allegations.

127. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 127 and therefore denies the allegations.

128. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 128 and therefore denies the allegations.

129. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 129 and therefore denies the allegations.

130. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 130 and therefore denies the allegations.

131. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 131 and therefore denies the allegations.

132. Kairoi admits that it is a limited liability company organized under Texas Law, but denies that it is headquartered in Dallas, Texas. Kairoi is headquartered in San Antonio, Texas. Kairoi admits that it operates in Austin, Dallas-Fort Worth, Denver, Houston, Salt Lake City, and San Antonio. Kairoi denies the remaining allegations in Paragraph 132.

133. Kairoi admits that it entered into a written contract, paid for, and used RealPage's YieldStar software, but denies the remaining allegations in Paragraph 133.

134. Kairoi denies the allegations in Paragraph 134.

135. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 135 and therefore denies the allegations.

136. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 136 and therefore denies the allegations.

137. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 137 and therefore denies the allegations.

138. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 138 and therefore denies the allegations.

139. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 139 and therefore denies the allegations.

140. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 140 and therefore denies the allegations.

141. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 141 and therefore denies the allegations.

142. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 142 and therefore denies the allegations.

143. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 143 and therefore denies the allegations.

144. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 144 and therefore denies the allegations.

145. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 145 and therefore denies the allegations.

146. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 146 and therefore denies the allegations.

147. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 147 and therefore denies the allegations.

148. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 148 and therefore denies the allegations.

149. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 149 and therefore denies the allegations.

150. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 150 and therefore denies the allegations.

151. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 151 and therefore denies the allegations.

152. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 152 and therefore denies the allegations.

153. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 153 and therefore denies the allegations.

154. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 154 and therefore denies the allegations.

155. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 155 and therefore denies the allegations.

156. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 156 and therefore denies the allegations.

157. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 157 and therefore denies the allegations.

158. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 158 and therefore denies the allegations.

159. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 159 and therefore denies the allegations.

160. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 160 and therefore denies the allegations.

161. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 161 and therefore denies the allegations.

162. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 162 and therefore denies the allegations.

163. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 163 and therefore denies the allegations.

164. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 164 and therefore denies the allegations.

165. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 165 and therefore denies the allegations.

166. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 166 and therefore denies the allegations.

167. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 167 and therefore denies the allegations.

168. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 168 and therefore denies the allegations.

169. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 169 and therefore denies the allegations.

170. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 170 and therefore denies the allegations.

171. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 171 and therefore denies the allegations.

172. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 172 and therefore denies the allegations.

173. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 173 and therefore denies the allegations.

174. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 174 and therefore denies the allegations.

175. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 175 and therefore denies the allegations.

176. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 176 and therefore denies the allegations.

177. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 177 and therefore denies the allegations.

178. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 178 and therefore denies the allegations.

179. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 179 and therefore denies the allegations.

180. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 180 and therefore denies the allegations.

181. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 181 and therefore denies the allegations.

182. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 182 and therefore denies the allegations.

183. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 183 and therefore denies the allegations.

184. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 184 and therefore denies the allegations.

185. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 185 and therefore denies the allegations.

186. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 186 and therefore denies the allegations.

187. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 187 and therefore denies the allegations.

188. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 188 and therefore denies the allegations.

189. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 189 and therefore denies the allegations.

190. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 190 and therefore denies the allegations.

191. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 191 and therefore denies the allegations.

192. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 192 and therefore denies the allegations.

193. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 193 and therefore denies the allegations.

194. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 194 and therefore denies the allegations.

195. To the extent Paragraph 195 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 195 as to any person or company other than Kairoi and therefore denies those allegations.

196. The allegations in Paragraph 196 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 196 as to any person or company other than Kairoi and therefore denies those allegations.

197. To the extent Paragraph 195 includes allegations about Kairoi, Kairoi denies the allegations Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 197 as to any person or company other than Kairoi and therefore denies those allegations.

198. To the extent Paragraph 198 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 198 as to any person or company other than Kairoi and therefore denies those allegations.

199. To the extent Paragraph 199 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 199 as to any person or company other than Kairoi and therefore denies those allegations.

200. Kairoi denies the allegations in Paragraph 200.

201. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 201 and therefore denies the allegations.

#### **IV. FACTUAL ALLEGATIONS**

202. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 202 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 202 as to any person or company other than Kairoi and therefore denies those allegations.

203. To the extent Paragraph 202 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 202 as to any person or company other than Kairoi and therefore denies those allegations.

204. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 204 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 204 as to any person or company other than Kairoi and therefore denies those allegations.

205. Kairoi denies the allegations in Paragraph 205.

206. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 206 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 206 as to any person or company other than Kairoi and therefore denies those allegations.

207. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 207 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 207 as to any person or company other than Kairoi and therefore denies those allegations.

208. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 208 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 208 as to any person or company other than Kairoi and therefore denies those allegations.

209. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 209 and therefore denies the allegations.

210. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 210 and therefore denies the allegations.

211. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 211 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 211 as to any person or company other than Kairoi and therefore denies those allegations.

212. To the extent Paragraph 212 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 212 as to any person or company other than Kairoi and therefore denies those allegations.

213. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 213 and therefore denies those allegations.

214. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 214 and therefore denies the allegations.

215. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 215 and therefore denies the allegations.

216. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 216 and therefore denies the allegations.

217. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 217 and therefore denies the allegations.

218. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 218 and therefore denies the allegations.

219. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 219 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 219 as to any person or company other than Kairoi and therefore denies those allegations.

220. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 220 as to any person or company other than Kairoi and therefore denies the allegations.

221. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 221 as to any person or company other than Kairoi and therefore denies the allegations.

222. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 222 as to any person or company other than Kairoi and therefore denies the allegations.

223. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 223 and therefore denies the allegations.

224. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 224 and therefore denies the allegations.

225. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 225 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 225 as to any person or company other than Kairoi and therefore denies those allegations.

226. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 226 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 226 as to any person or company other than Kairoi and therefore denies those allegations.

227. To the extent Paragraph 227 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 227 as to any person or company other than Kairoi and therefore denies those allegations.

228. Kairoi states that the referenced source speaks for itself. Paragraph 228 does not call for a response. To the extent a response is required, Kairoi denies the allegations.

229. Kairoi states that the referenced source speaks for itself. The allegations in Paragraph 229 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

230. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 230 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 230 as to any person or company other than Kairoi and therefore denies those allegations.

231. To the extent Paragraph 231 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 231 as to any person or company other than Kairoi and therefore denies those allegations.

232. To the extent Paragraph 232 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 232 as to any person or company other than Kairoi and therefore denies those allegations.

233. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 233 and therefore denies the allegations.

234. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 234 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without

sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 234 as to any person or company other than Kairoi and therefore denies those allegations.

235. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 235 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 235 as to any person or company other than Kairoi and therefore denies those allegations.

236. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 236 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 236 as to any person or company other than Kairoi and therefore denies those allegations.

237. To the extent Paragraph 237 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 237 as to any person or company other than Kairoi and therefore denies those allegations.

238. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 238 and therefore denies the allegations.

239. To the extent Paragraph 239 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 239 as to any person or company other than Kairoi and therefore denies those allegations.

240. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 240 and therefore denies the allegations.

241. To the extent Paragraph 241 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 241 as to any person or company other than Kairoi and therefore denies those allegations.

242. To the extent Paragraph 242 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 242 as to any person or company other than Kairoi and therefore denies those allegations.

243. To the extent Paragraph 243 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 243 as to any person or company other than Kairoi and therefore denies those allegations.

244. To the extent Paragraph 244 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 244 as to any person or company other than Kairoi and therefore denies those allegations.

245. To the extent Paragraph 245 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 245 as to any person or company other than Kairoi and therefore denies those allegations.

246. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 246 and therefore denies the allegations.

247. To the extent Paragraph 247 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 247 as to any person or company other than Kairoi and therefore denies those allegations.

248. To the extent Paragraph 248 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 248 as to any person or company other than Kairoi and therefore denies those allegations.

249. To the extent Paragraph 249 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 249 as to any person or company other than Kairoi and therefore denies those allegations.

250. To the extent Paragraph 250 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 250 as to any person or company other than Kairoi and therefore denies those allegations.

251. To the extent Paragraph 251 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 251 as to any person or company other than Kairoi and therefore denies those allegations.

252. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 252 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 252 as to any person or company other than Kairoi and therefore denies those allegations.

253. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 253 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 4 as to any person or company other than Kairoi and therefore denies those allegations.

254. To the extent Paragraph 254 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 254 as to any person or company other than Kairoi and therefore denies those allegations.

255. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 255 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 255 as to any person or company other than Kairoi and therefore denies those allegations.

256. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 256 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 256 as to any person or company other than Kairoi and therefore denies those allegations.

257. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 257 and therefore denies the allegations.

258. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 258 and therefore denies the allegations.

259. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 259 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 259 as to any person or company other than Kairoi and therefore denies those allegations.

260. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 260 and therefore denies the allegations

261. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 261 and therefore denies the allegations.

262. To the extent Paragraph 262 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 262 as to any person or company other than Kairoi and therefore denies those allegations.

263. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 263 and therefore denies the allegations.

264. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 264 and therefore denies the allegations.

265. To the extent Paragraph 265 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 265 as to any person or company other than Kairoi and therefore denies those allegations.

266. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 266 and therefore denies the allegations.

267. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 267 and therefore denies the allegations.

268. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 268 and therefore denies the allegations.

269. To the extent Paragraph 269 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 269 as to any person or company other than Kairoi and therefore denies those allegations.

270. To the extent Paragraph 270 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 270 as to any person or company other than Kairoi and therefore denies those allegations.

271. To the extent Paragraph 271 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 271 as to any person or company other than Kairoi and therefore denies those allegations.

272. To the extent Paragraph 272 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 272 as to any person or company other than Kairoi and therefore denies those allegations.

273. To the extent Paragraph 273 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 273 as to any person or company other than Kairoi and therefore denies those allegations.

274. To the extent Paragraph 274 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 274 as to any person or company other than Kairoi and therefore denies those allegations.

275. To the extent Paragraph 275 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 275 as to any person or company other than Kairoi and therefore denies those allegations.

276. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 276 and therefore denies the allegations.

277. To the extent Paragraph 277 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 277 as to any person or company other than Kairoi and therefore denies those allegations.

278. To the extent Paragraph 277 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 277 as to any person or company other than Kairoi and therefore denies those allegations.

279. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 279 and therefore denies the allegations.

280. To the extent Paragraph 280 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 280 as to any person or company other than Kairoi and therefore denies those allegations.

281. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 281 and therefore denies the allegations.

282. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 282 and therefore denies the allegations.

283. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 283 and therefore denies the allegations.

284. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 284 and therefore denies the allegations.

285. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 285 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 285 as to any person or company other than Kairoi and therefore denies those allegations.

286. To the extent Paragraph 286 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 286 as to any person or company other than Kairoi and therefore denies those allegations.

287. To the extent Paragraph 287 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 287 as to any person or company other than Kairoi and therefore denies those allegations.

288. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 288 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 288 as to any person or company other than Kairoi and therefore denies those allegations.

289. To the extent Paragraph 289 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 289 as to any person or company other than Kairoi and therefore denies those allegations.

290. To the extent Paragraph 290 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 290 as to any person or company other than Kairoi and therefore denies those allegations.

291. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 291 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 291 as to any person or company other than Kairoi and therefore denies those allegations.

292. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 292 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 292 as to any person or company other than Kairoi and therefore denies those allegations.

293. To the extent Paragraph 293 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 293 as to any person or company other than Kairoi and therefore denies those allegations.

294. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 294 and therefore denies the allegations.

295. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 295 and therefore denies the allegations.

296. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 296 and therefore denies the allegations.

297. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 297 and therefore denies the allegations.

298. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 294 and therefore denies the allegations.

299. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 299 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 299 as to any person or company other than Kairoi and therefore denies those allegations.

300. Kairoi states that the referenced source speaks for itself. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 300 and therefore denies the allegations.

301. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 301 and therefore denies the allegations.

302. Kairoi states that the referenced source speaks for itself. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 302 and therefore denies the allegations.

303. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 303 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 303 as to any person or company other than Kairoi and therefore denies those allegations.

304. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 304 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 304 as to any person or company other than Kairoi and therefore denies those allegations.

305. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 305 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 305 as to any person or company other than Kairoi and therefore denies those allegations.

306. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 306 and therefore denies the allegations.

307. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 307 and therefore denies the allegations..

308. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 308 and therefore denies the allegations.

309. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 309 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 309 as to any person or company other than Kairoi and therefore denies those allegations.

310. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 310 and therefore denies the allegations.

311. To the extent Paragraph 311 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 311 as to any person or company other than Kairoi and therefore denies those allegations.

312. To the extent Paragraph 312 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 312 as to any person or company other than Kairoi and therefore denies those allegations.

313. To the extent Paragraph 313 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 313 as to any person or company other than Kairoi and therefore denies those allegations.

314. Kairoi states that the referenced sources speak for themselves. Kairoi admits that it is a member of the Texas Apartment Association, but to the extent that Paragraph 314 otherwise includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 314 as to any person or company other than Kairoi and therefore denies those allegations.

315. Kairoi states that the referenced sources speak for themselves. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 315 and therefore denies the allegations.

316. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 316 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 316 as to any person or company other than Kairoi and therefore denies those allegations.

317. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 317 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 317 as to any person or company other than Kairoi and therefore denies those allegations.

318. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 318 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 318 as to any person or company other than Kairoi and therefore denies those allegations.

319. Kairoi states that the referenced sources speak for themselves. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 319 and therefore denies the allegations.

320. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 320 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 320 as to any person or company other than Kairoi and therefore denies those allegations.

321. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 321 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 321 as to any person or company other than Kairoi and therefore denies those allegations.

322. Kairoi states that the referenced source speaks for itself. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 322 and therefore denies the allegations.

323. Kairoi states that the referenced sources speak for themselves. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 323 and therefore denies the allegations.

324. To the extent Paragraph 324 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 324 as to any person or company other than Kairoi and therefore denies those allegations.

325. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 325 and therefore denies the allegations.

326. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 326 and therefore denies the allegations.

327. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 327 and therefore denies the allegations.

328. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 328 and therefore denies the allegations.

329. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 329 and therefore denies the allegations.

330. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 330 and therefore denies the allegations.

331. To the extent Paragraph 311 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 311 as to any person or company other than Kairoi and therefore denies those allegations.

332. To the extent Paragraph 332 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 332 as to any person or company other than Kairoi and therefore denies those allegations.

333. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 333 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 333 as to any person or company other than Kairoi and therefore denies those allegations.

334. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 334 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi does not operate in Nashville, Tennessee. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 334 as to any person or company other than Kairoi and therefore denies those allegations.

335. To the extent Paragraph 335 includes allegations about Kairoi, Kairoi denies the allegations, including the allegations in Figures 9 and 10. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 335 as to any person or company other than Kairoi and therefore denies those allegations.

336. To the extent Paragraph 336 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 336 as to any person or company other than Kairoi and therefore denies those allegations.

337. To the extent Paragraph 337 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 337 as to any person or company other than Kairoi and therefore denies those allegations.

338. To the extent Paragraph 338 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 338 as to any person or company other than Kairoi and therefore denies those allegations.

339. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 339 or Figure 11 and therefore denies the allegations.

340. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 340 or Figure 12 and therefore denies the allegations.

341. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 341 or Figure 13 and therefore denies the allegations.

342. Kairoi admits it operates in Dallas, Texas, but denies the remaining allegations, including those depicted in Figure 14. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 342 and Figure 14 as to any person or company other than Kairoi and therefore denies those allegations.

343. Kairoi admits it operates in Denver, Colorado, but denies the remaining allegations, including those depicted in Figure 15. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 343 and Figure 15 as to any person or company other than Kairoi and therefore denies those allegations.

344. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 344 or Figure 16 and therefore denies the allegations.

345. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 345 and Figure 17 and therefore denies the allegations.

346. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 346 and Figure 18 and therefore denies the allegations.

347. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 347 and Figure 19 and therefore denies the allegations.

348. To the extent Paragraph 348 and Figures 20-28 include allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 348 as to any person or company other than Kairoi and therefore denies those allegations.

349. To the extent Paragraph 349 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 349 as to any person or company other than Kairoi and therefore denies those allegations.

350. To the extent Paragraph 350 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 350 as to any person or company other than Kairoi and therefore denies those allegations.

351. Kairoi admits that a regression analysis is a statistical method that tries to describe relationships between variables. Except as expressly admitted, Kairoi denies the remaining allegations in Paragraph 351.

352. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 352 and therefore denies those allegations.

353. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 353 and Figure 29 and therefore denies the allegations.

354. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 354 and therefore denies the allegations.

355. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 355 and therefore denies the allegations.

356. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 356 and therefore denies the allegations.

357. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 357 and Figure 30 and therefore denies the allegations.

358. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 358 and therefore denies the allegations.

359. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 359 and therefore denies the allegations.

360. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 360 and Figure 31 and therefore denies the allegations.

361. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 361 and Figure 32 therefore denies the allegations.

362. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 362 and Figure 33 therefore denies the allegations.

363. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 363 and therefore denies the allegations.

364. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 364 and Figure 34 and therefore denies the allegations.

365. To the extent Paragraph 365 and Figure 34 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 365 as to any person or company other than Kairoi and therefore denies those allegations.

366. The allegations in Paragraph 366 contain sources which speak for themselves and legal conclusions to which no response is required. To the extent a response is required, Kairoi

denies that “plus factors” in the market for multifamily rental housing units render the market “highly conducive to collusion.”

367. The allegations in Paragraph 367 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

368. Kairoi states that the referenced source speaks for itself. Kairoi denies the remaining allegations in Paragraph 368.

369. The allegations in Paragraph 369 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 369 and therefore denies them.

370. The allegations in Paragraph 370 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 370 and therefore denies them.

371. The allegations in Paragraph 371 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 371 and therefore denies them.

372. The allegations in Paragraph 372 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 372 and therefore denies them.

373. The allegations in Paragraph 373 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 373 and therefore denies them.

374. The allegations in Paragraph 374 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 374 and therefore denies them.

375. The allegations in Paragraph 375 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 375 and therefore denies them.

376. The allegations in Paragraph 376 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 376 and therefore denies them.

377. The allegations in Paragraph 377 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 377 and therefore denies them.

378. The allegations in Paragraph 378 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 378 and therefore denies them.

379. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 379 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 379 as to any person or company other than Kairoi and therefore denies those allegations.

380. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 380 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 380 as to any person or company other than Kairoi and therefore denies those allegations.

381. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 381 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 381 as to any person or company other than Kairoi and therefore denies those allegations.

382. To the extent Paragraph 382 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 382 as to any person or company other than Kairoi and therefore denies those allegations.

383. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 383 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 383 as to any person or company other than Kairoi and therefore denies those allegations.

384. Kairoi states that the referenced sources speak for themselves. To the extent Paragraph 384 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 384 as to any person or company other than Kairoi and therefore denies those allegations.

385. Kairoi admits that RealPage hosts conferences, but Kairoi denies the remaining allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 385 as to any person or company other than Kairoi and therefore denies those allegations.

386. To the extent Paragraph 386 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 386 as to any person or company other than Kairoi and therefore denies those allegations.

387. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 387 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 387 as to any person or company other than Kairoi and therefore denies those allegations.

388. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 388 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 388 as to any person or company other than Kairoi and therefore denies those allegations.

389. To the extent Paragraph 389 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 389 as to any person or company other than Kairoi and therefore denies those allegations.

390. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 390 and therefore denies the allegations.

391. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 391 and therefore denies the allegations.

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392. The allegations in Paragraph 392 contain legal conclusions to which no response is required. To the extent a response is required and Paragraph 392 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 392 as to any person or company other than Kairoi and therefore denies those allegations.

393. The allegations in Paragraph 393 contain legal conclusions to which no response is required. To the extent a response is required and Paragraph 393 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form

a belief about the truth of the allegations in Paragraph 393 as to any person or company other than Kairoi and therefore denies those allegations.

394. The allegations in Paragraph 394 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

395. The allegations in Paragraph 395 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

396. The allegations in Paragraph 396 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

397. Kairoi states that the referenced source speaks for itself. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 397 and therefore denies the allegations.

398. The allegations in Paragraph 398 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

399. The allegations in Paragraph 396 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

400. Kairoi states that Paragraph 400 states a legal conclusion to which no response is required. To the extent a response is required, Kairoi denies the allegations.

401. To the extent Paragraph 401 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 401 as to any person or company other than Kairoi and therefore denies those allegations.

402. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 402 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 402 and Figure 35 as to any person or company other than Kairoi and therefore denies those allegations.

403. To the extent Paragraph 403 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 403 as to any person or company other than Kairoi and therefore denies those allegations.

404. To the extent Paragraph 404 includes allegations about Kairoi, Kairoi denies the allegations. . Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 404 as to any person or company other than Kairoi and therefore denies those allegations.

405. To the extent Paragraph 405 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 405 as to any person or company other than Kairoi and therefore denies those allegations.

406. To the extent Paragraph 406 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 406 as to any person or company other than Kairoi and therefore denies those allegations.

407. Kairoi states that the referenced source speaks for itself. To the extent a response is required, Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 407 and therefore denies the allegations.

408. Kairoi states that Paragraph 408 states a legal conclusion to which no response is required. To the extent a response is required, Kairoi denies the allegations.

409. Kairoi states that Paragraph 409 states a legal conclusion to which no response is required. To the extent a response is required, Kairoi denies the allegations.

410. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 410 and therefore denies the allegations.

411. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 411 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 411 as to any person or company other than Kairoi and therefore denies those allegations.

412. To the extent Paragraph 412 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 412 as to any person or company other than Kairoi and therefore denies those allegations.

413. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 413 and therefore denies the allegations.

414. To the extent Paragraph 413 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 413 as to any person or company other than Kairoi and therefore denies those allegations.

415. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 415 and therefore denies the allegations.

416. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 416 and therefore denies the allegations.

417. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 417 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 417 as to any person or company other than Kairoi and therefore denies those allegations.

418. To the extent Paragraph 418 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 418 as to any person or company other than Kairoi and therefore denies those allegations.

419. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 419 and therefore denies the allegations.

420. To the extent Paragraph 420 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 420 as to any person or company other than Kairoi and therefore denies the allegations.

421. To the extent Paragraph 421 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 421 as to any person or company other than Kairoi and therefore denies those allegations.

422. Paragraph 422 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

423. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 423 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 423 as to any person or company other than Kairoi and therefore denies those allegations.

424. To the extent Paragraph 424 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 424 as to any person or company other than Kairoi and therefore denies those allegations.

425. Kairoi admits that it operates in Austin, Texas, but denies the remaining allegations related to Kairoi in Paragraph 425. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 425 as to any person or company other than Kairoi and therefore denies those allegations.

426. Kairoi denies the allegations in Paragraph 426.

427. Kairoi denies the allegations in Paragraph 427.

428. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 428 and therefore denies the allegations.

429. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 429 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 429 as to any person or company other than Kairoi and therefore denies those allegations.

430. To the extent Paragraph 430 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 430 as to any person or company other than Kairoi and therefore denies those allegations.

431. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 431 and therefore denies the allegations.

432. To the extent Paragraph 432 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 432 as to any person or company other than Kairoi and therefore denies those allegations.

433. To the extent Paragraph 433 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 433 as to any person or company other than Kairoi and therefore denies those allegations.

434. To the extent Paragraph 434 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 434 as to any person or company other than Kairoi and therefore denies those allegations.

435. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 435 and therefore denies the allegations.

436. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 436 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 436 as to any person or company other than Kairoi and therefore denies those allegations.

437. To the extent Paragraph 437 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 437 as to any person or company other than Kairoi and therefore denies those allegations.

438. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 438 and therefore denies the allegations.

439. To the extent Paragraph 439 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 439 as to any person or company other than Kairoi and therefore denies those allegations.

440. To the extent Paragraph 440 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 440 as to any person or company other than Kairoi and therefore denies those allegations.

441. To the extent Paragraph 441 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 411 as to any person or company other than Kairoi and therefore denies those allegations.

442. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 442 and therefore denies the allegations.

443. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 443 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 443 as to any person or company other than Kairoi and therefore denies those allegations.

444. To the extent Paragraph 444 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 444 as to any person or company other than Kairoi and therefore denies those allegations.

445. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 445 and therefore denies the allegations.

446. To the extent Paragraph 446 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 446 as to any person or company other than Kairoi and therefore denies those allegations.

447. To the extent Paragraph 447 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 447 as to any person or company other than Kairoi and therefore denies those allegations.

448. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 448 and therefore denies the allegations.

449. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 449 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 449 as to any person or company other than Kairoi and therefore denies those allegations.

450. To the extent Paragraph 450 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 450 as to any person or company other than Kairoi and therefore denies those allegations.

451. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 450 and therefore denies the allegations.

452. To the extent Paragraph 452 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 452 as to any person or company other than Kairoi and therefore denies those allegations.

453. To the extent Paragraph 453 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 453 as to any person or company other than Kairoi and therefore denies those allegations.

454. Paragraph 454 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

455. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 455 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 455 as to any person or company other than Kairoi and therefore denies those allegations.

456. To the extent Paragraph 456 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 456 as to any person or company other than Kairoi and therefore denies those allegations.

457. Kairoi admits that it operates in Dallas, Texas, but denies the remaining allegations related to Kairoi in Paragraph 457. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 457 as to any person or company other than Kairoi and therefore denies those allegations.

458. Kairoi denies the allegations in Paragraph 458.

459. Kairoi denies the allegations in Paragraph 459.

460. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 460 and therefore denies the allegations.

461. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 461 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 461 as to any person or company other than Kairoi and therefore denies those allegations.

462. To the extent Paragraph 462 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 462 as to any person or company other than Kairoi and therefore denies those allegations.

463. Kairoi admits that it operates in Denver, Colorado but denies the remaining allegations related to Kairoi in Paragraph 463. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 463 as to any person or company other than Kairoi and therefore denies those allegations.

464. Kairoi denies the allegations in Paragraph 464.

465. Kairoi denies the allegations in Paragraph 465.

466. To the extent Paragraph 466 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 466 as to any person or company other than Kairoi and therefore denies those allegations.

467. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 467 and therefore denies the allegations.

468. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 468 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 468 as to any person or company other than Kairoi and therefore denies those allegations.

469. To the extent Paragraph 469 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 469 as to any person or company other than Kairoi and therefore denies those allegations.

470. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 470 and therefore denies the allegations.

471. To the extent Paragraph 471 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 471 as to any person or company other than Kairoi and therefore denies those allegations.

472. To the extent Paragraph 472 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 472 as to any person or company other than Kairoi and therefore denies those allegations.

473. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 473 and therefore denies the allegations.

474. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 474 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 474 as to any person or company other than Kairoi and therefore denies those allegations.

475. To the extent Paragraph 475 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 475 as to any person or company other than Kairoi and therefore denies those allegations.

476. Kairoi admits that it operates in Houston, Texas, but denies the remaining allegations related to Kairoi in Paragraph 476. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 476 as to any person or company other than Kairoi and therefore denies those allegations.

477. Kairoi denies the allegations in Paragraph 477.

478. Kairoi denies the allegations in Paragraph 478.

479. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 479 and therefore denies the allegations.

480. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 480 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 480 as to any person or company other than Kairoi and therefore denies those allegations.

481. To the extent Paragraph 481 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 481 as to any person or company other than Kairoi and therefore denies those allegations.

482. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 482 and therefore denies the allegations.

483. To the extent Paragraph 483 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 483 as to any person or company other than Kairoi and therefore denies those allegations.

484. To the extent Paragraph 484 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 484 as to any person or company other than Kairoi and therefore denies those allegations.

485. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

486. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 486 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 486 as to any person or company other than Kairoi and therefore denies those allegations.

487. To the extent Paragraph 487 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 487 as to any person or company other than Kairoi and therefore denies those allegations.

488. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 488 and therefore denies the allegations.

489. To the extent Paragraph 489 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 489 as to any person or company other than Kairoi and therefore denies those allegations.

490. To the extent Paragraph 490 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 490 as to any person or company other than Kairoi and therefore denies those allegations.

491. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 491 and therefore denies the allegations.

492. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 492 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 492 as to any person or company other than Kairoi and therefore denies those allegations.

493. To the extent Paragraph 493 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 493 as to any person or company other than Kairoi and therefore denies those allegations.

494. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 494 and therefore denies the allegations.

495. To the extent Paragraph 495 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 495 as to any person or company other than Kairoi and therefore denies those allegations.

496. To the extent Paragraph 496 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 496 as to any person or company other than Kairoi and therefore denies those allegations.

497. To the extent Paragraph 497 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 497 as to any person or company other than Kairoi and therefore denies those allegations.

498. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 498 and therefore denies the allegations.

499. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 499 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 499 as to any person or company other than Kairoi and therefore denies those allegations.

500. To the extent Paragraph 500 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 500 as to any person or company other than Kairoi and therefore denies those allegations.

501. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 501 and therefore denies the allegations.

502. To the extent Paragraph 502 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 502 as to any person or company other than Kairoi and therefore denies those allegations.

503. To the extent Paragraph 503 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 503 as to any person or company other than Kairoi and therefore denies those allegations.

504. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

505. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 505 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 505 as to any person or company other than Kairoi and therefore denies those allegations.

506. To the extent Paragraph 506 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 506 as to any person or company other than Kairoi and therefore denies those allegations.

507. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 507 and therefore denies the allegations.

508. To the extent Paragraph 508 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 508 as to any person or company other than Kairoi and therefore denies those allegations.

509. To the extent Paragraph 509 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 509 as to any person or company other than Kairoi and therefore denies those allegations.

510. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 510 and therefore denies the allegations.

511. Kairo states that the referenced source speaks for itself. To the extent Paragraph 511 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 511 as to any person or company other than Kairoi and therefore denies those allegations.

512. To the extent Paragraph 512 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 512 as to any person or company other than Kairoi and therefore denies those allegations.

513. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 513 and therefore denies the allegations.

514. To the extent Paragraph 514 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 514 as to any person or company other than Kairoi and therefore denies those allegations.

515. To the extent Paragraph 515 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 515 as to any person or company other than Kairoi and therefore denies those allegations.

516. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 516 and therefore denies the allegations.

517. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 517 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 517 as to any person or company other than Kairoi and therefore denies those allegations.

518. To the extent Paragraph 518 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 518 as to any person or company other than Kairoi and therefore denies those allegations.

519. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 519 and therefore denies the allegations.

520. To the extent Paragraph 520 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 520 as to any person or company other than Kairoi and therefore denies those allegations.

521. To the extent Paragraph 521 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 521 as to any person or company other than Kairoi and therefore denies those allegations.

522. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 522 and therefore denies the allegations.

523. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 523 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 523 as to any person or company other than Kairoi and therefore denies those allegations.

524. To the extent Paragraph 524 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 524 as to any person or company other than Kairoi and therefore denies those allegations.

525. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 525 and therefore denies the allegations.

526. To the extent Paragraph 526 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 526 as to any person or company other than Kairoi and therefore denies those allegations.

527. To the extent Paragraph 527 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 527 as to any person or company other than Kairoi and therefore denies those allegations.

528. To the extent Paragraph 528 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 528 as to any person or company other than Kairoi and therefore denies those allegations.

529. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 529 and therefore denies the allegations.

530. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 530 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 530 as to any person or company other than Kairoi and therefore denies those allegations.

531. To the extent Paragraph 531 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 531 as to any person or company other than Kairoi and therefore denies those allegations.

532. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 532 and therefore denies the allegations.

533. To the extent Paragraph 533 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 533 as to any person or company other than Kairoi and therefore denies those allegations.

534. To the extent Paragraph 534 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 534 as to any person or company other than Kairoi and therefore denies those allegations.

535. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

536. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 536 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 536 as to any person or company other than Kairoi and therefore denies those allegations.

537. To the extent Paragraph 537 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 537 as to any person or company other than Kairoi and therefore denies those allegations.

538. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 538 and therefore denies the allegations.

539. To the extent Paragraph 539 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 539 as to any person or company other than Kairoi and therefore denies those allegations.

540. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 540 and therefore denies the allegations.

541. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 541 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 541 as to any person or company other than Kairoi and therefore denies those allegations.

542. To the extent Paragraph 542 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 542 as to any person or company other than Kairoi and therefore denies those allegations.

543. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 543 and therefore denies the allegations.

544. To the extent Paragraph 544 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 544 as to any person or company other than Kairoi and therefore denies those allegations.

545. To the extent Paragraph 545 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 545 as to any person or company other than Kairoi and therefore denies those allegations.

546. To the extent Paragraph 546 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 546 as to any person or company other than Kairoi and therefore denies those allegations.

547. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 547 and therefore denies the allegations.

548. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 548 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 548 as to any person or company other than Kairoi and therefore denies those allegations.

549. To the extent Paragraph 549 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 549 as to any person or company other than Kairoi and therefore denies those allegations.

550. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 550 and therefore denies the allegations.

551. To the extent Paragraph 551 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 551 as to any person or company other than Kairoi and therefore denies those allegations.

552. To the extent Paragraph 552 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 552 as to any person or company other than Kairoi and therefore denies those allegations.

553. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 553 and therefore denies the allegations.

554. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 554 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 554 as to any person or company other than Kairoi and therefore denies those allegations.

555. To the extent Paragraph 555 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 555 as to any person or company other than Kairoi and therefore denies those allegations.

556. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 556 and therefore denies the allegations.

557. To the extent Paragraph 557 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 557 as to any person or company other than Kairoi and therefore denies those allegations.

558. To the extent Paragraph 558 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 558 as to any person or company other than Kairoi and therefore denies those allegations.

559. To the extent Paragraph 559 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 559 as to any person or company other than Kairoi and therefore denies those allegations.

560. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 560 and therefore denies the allegations.

561. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 561 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 561 as to any person or company other than Kairoi and therefore denies those allegations.

562. To the extent Paragraph 562 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 562 as to any person or company other than Kairoi and therefore denies those allegations.

563. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 563 and therefore denies the allegations.

564. To the extent Paragraph 564 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 564 as to any person or company other than Kairoi and therefore denies those allegations.

565. To the extent Paragraph 565 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 565 as to any person or company other than Kairoi and therefore denies those allegations.

566. To the extent Paragraph 566 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 566 as to any person or company other than Kairoi and therefore denies those allegations.

567. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 567 and therefore denies the allegations.

568. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 568 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 568 as to any person or company other than Kairoi and therefore denies those allegations.

569. To the extent Paragraph 569 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 569 as to any person or company other than Kairoi and therefore denies those allegations.

570. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 570 and therefore denies the allegations.

571. To the extent Paragraph 571 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 571 as to any person or company other than Kairoi and therefore denies those allegations.

572. To the extent Paragraph 572 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 572 as to any person or company other than Kairoi and therefore denies those allegations.

573. To the extent Paragraph 573 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 573 as to any person or company other than Kairoi and therefore denies those allegations.

574. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 574 and therefore denies the allegations.

575. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 575 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 575 as to any person or company other than Kairoi and therefore denies those allegations.

576. To the extent Paragraph 576 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 576 as to any person or company other than Kairoi and therefore denies those allegations.

577. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 577 and therefore denies the allegations.

578. To the extent Paragraph 578 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 578 as to any person or company other than Kairoi and therefore denies those allegations.

579. To the extent Paragraph 579 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 579 as to any person or company other than Kairoi and therefore denies those allegations.

580. To the extent Paragraph 580 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 580 as to any person or company other than Kairoi and therefore denies those allegations.

581. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 581 and therefore denies the allegations.

582. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 582 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 582 as to any person or company other than Kairoi and therefore denies those allegations.

583. To the extent Paragraph 583 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 583 as to any person or company other than Kairoi and therefore denies those allegations.

584. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 583 and therefore denies the allegations.

585. To the extent Paragraph 585 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 585 as to any person or company other than Kairoi and therefore denies those allegations.

586. To the extent Paragraph 586 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 586 as to any person or company other than Kairoi and therefore denies those allegations.

587. To the extent Paragraph 587 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 587 as to any person or company other than Kairoi and therefore denies those allegations.

588. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 588 and therefore denies the allegations.

589. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 589 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 589 as to any person or company other than Kairoi and therefore denies those allegations.

590. To the extent Paragraph 590 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 590 as to any person or company other than Kairoi and therefore denies those allegations.

591. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

592. To the extent Paragraph 592 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 592 as to any person or company other than Kairoi and therefore denies those allegations.

593. To the extent Paragraph 593 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 593 as to any person or company other than Kairoi and therefore denies those allegations.

594. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 594 and therefore denies the allegations.

595. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 595 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 595 as to any person or company other than Kairoi and therefore denies those allegations.

596. To the extent Paragraph 596 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 596 as to any person or company other than Kairoi and therefore denies those allegations.

597. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 597 and therefore denies the allegations.

598. To the extent Paragraph 598 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 598 as to any person or company other than Kairoi and therefore denies those allegations.

599. To the extent Paragraph 599 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 599 as to any person or company other than Kairoi and therefore denies those allegations.

600. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 600 and therefore denies the allegations.

601. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 601 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 601 as to any person or company other than Kairoi and therefore denies those allegations.

602. To the extent Paragraph 602 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 602 as to any person or company other than Kairoi and therefore denies those allegations.

603. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

604. To the extent Paragraph 604 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 604 as to any person or company other than Kairoi and therefore denies those allegations.

605. To the extent Paragraph 605 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 605 as to any person or company other than Kairoi and therefore denies those allegations.

606. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 606 and therefore denies the allegations.

607. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 607 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 607 as to any person or company other than Kairoi and therefore denies those allegations.

608. To the extent Paragraph 608 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 608 as to any person or company other than Kairoi and therefore denies those allegations.

609. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 609 and therefore denies the allegations.

610. To the extent Paragraph 610 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 610 as to any person or company other than Kairoi and therefore denies those allegations.

611. To the extent Paragraph 611 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 611 as to any person or company other than Kairoi and therefore denies those allegations.

612. To the extent Paragraph 612 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 612 as to any person or company other than Kairoi and therefore denies those allegations.

613. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 613 and therefore denies the allegations.

614. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 614 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 614 as to any person or company other than Kairoi and therefore denies those allegations.

615. To the extent Paragraph 615 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 615 as to any person or company other than Kairoi and therefore denies those allegations.

616. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 616 and therefore denies the allegations.

617. To the extent Paragraph 617 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 617 as to any person or company other than Kairoi and therefore denies those allegations.

618. To the extent Paragraph 618 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 618 as to any person or company other than Kairoi and therefore denies those allegations.

619. To the extent Paragraph 619 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 619 as to any person or company other than Kairoi and therefore denies those allegations.

620. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 620 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 620 as to any person or company other than Kairoi and therefore denies those allegations.

621. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 621 and therefore denies those allegations.

622. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 622 and therefore denies the allegations.

623. To the extent Paragraph 623 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 623 as to any person or company other than Kairoi and therefore denies those allegations.

624. To the extent Paragraph 624 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 624 as to any person or company other than Kairoi and therefore denies those allegations.

625. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 625 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 625 as to any person or company other than Kairoi and therefore denies those allegations.

626. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 626 and therefore denies the allegations.

627. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 627 and therefore denies the allegations.

628. To the extent Paragraph 628 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 628 as to any person or company other than Kairoi and therefore denies those allegations.

629. To the extent Paragraph 629 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 629 as to any person or company other than Kairoi and therefore denies those allegations.

630. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 630 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 630 as to any person or company other than Kairoi and therefore denies those allegations.

631. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 631 and therefore denies the allegations.

632. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 632 and therefore denies the allegations.

633. To the extent Paragraph 633 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 633 as to any person or company other than Kairoi and therefore denies those allegations.

634. To the extent Paragraph 634 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 634 as to any person or company other than Kairoi and therefore denies those allegations.

635. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 635 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 635 as to any person or company other than Kairoi and therefore denies those allegations.

636. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 636 and therefore denies the allegations.

637. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 637 and therefore denies the allegations.

638. To the extent Paragraph 638 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 638 as to any person or company other than Kairoi and therefore denies those allegations.

639. To the extent Paragraph 639 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 639 as to any person or company other than Kairoi and therefore denies those allegations.

640. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 640 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 640 as to any person or company other than Kairoi and therefore denies those allegations.

641. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 641 and therefore denies the allegations.

642. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 642 and therefore denies the allegations.

643. To the extent Paragraph 643 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 643 as to any person or company other than Kairoi and therefore denies those allegations.

644. To the extent Paragraph 644 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 644 as to any person or company other than Kairoi and therefore denies those allegations.

645. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 644 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 644 as to any person or company other than Kairoi and therefore denies those allegations.

646. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

647. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 647 and therefore denies the allegations.

648. To the extent Paragraph 648 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 648 as to any person or company other than Kairoi and therefore denies those allegations.

649. To the extent Paragraph 649 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 649 as to any person or company other than Kairoi and therefore denies those allegations.

650. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 650 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 650 as to any person or company other than Kairoi and therefore denies those allegations.

651. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 651 and therefore denies the allegations.

652. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 652 and therefore denies the allegations.

653. To the extent Paragraph 653 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 653 as to any person or company other than Kairoi and therefore denies those allegations.

654. To the extent Paragraph 654 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 654 as to any person or company other than Kairoi and therefore denies those allegations.

655. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 655 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 655 as to any person or company other than Kairoi and therefore denies those allegations.

656. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 656 and therefore denies the allegations.

657. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 657 and therefore denies the allegations.

658. To the extent Paragraph 658 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth

of the allegations in Paragraph 658 as to any person or company other than Kairoi and therefore denies those allegations.

659. To the extent Paragraph 659 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 659 as to any person or company other than Kairoi and therefore denies those allegations.

660. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 660 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 660 as to any person or company other than Kairoi and therefore denies those allegations.

661. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 661 and therefore denies the allegations.

662. Kairoi admits that it operates in Salt Lake City, Utah, but denies the remaining allegations related to Kairoi in Paragraph 662. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 662 as to any person or company other than Kairoi and therefore denies those allegations.

663. Kairoi denies the allegations in Paragraph 663.

664. Kairoi denies the allegations in Paragraph 664.

665. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 665 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 665 as to any person or company other than Kairoi and therefore denies those allegations.

666. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

667. Kairoi admits that it operates in San Antonio, Texas, but denies the remaining allegations related to Kairoi in Paragraph 667. Kairoi is without sufficient knowledge or

information to form a belief about the truth of the allegations in Paragraph 667 as to any person or company other than Kairoi and therefore denies those allegations.

668. Kairoi denies the allegations in Paragraph 668.

669. Kairoi denies the allegations in Paragraph 669.

670. To the extent Paragraph 670 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 670 as to any person or company other than Kairoi and therefore denies those allegations.

671. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph and therefore denies the allegations.

672. To the extent Paragraph 672 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 672 as to any person or company other than Kairoi and therefore denies those allegations.

673. Kairoi states that the referenced source speaks for itself. To the extent Paragraph 673 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 673 as to any person or company other than Kairoi and therefore denies those allegations.

674. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 674 and therefore denies the allegations.

675. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 675 and therefore denies the allegations.

676. To the extent Paragraph 676 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 676 as to any person or company other than Kairoi and therefore denies those allegations.

677. To the extent Paragraph 677 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 677 as to any person or company other than Kairoi and therefore denies those allegations.

678. Kairoi states that Paragraph 678 states a legal conclusion to which no response is required. To the extent a response is required, Kairoi denies the allegations.

679. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 679 and therefore denies the allegations.

680. To the extent Paragraph 680 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 680 as to any person or company other than Kairoi and therefore denies those allegations.

## **VI. CLASS ACTION ALLEGATIONS**

681. Kairoi admits that Plaintiffs purport to bring this action as a class action pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(3), but denies that Plaintiffs are entitled to proceed forward as a class against Kairoi or that any putative class member is entitled to any relief sought herein.

682. Kairoi admits that Plaintiffs purport to exclude certain persons and entities from the putative class on whose behalf Plaintiffs purport to bring this action. . Kairoi denies that Plaintiffs are entitled to proceed forward as a class against Kairoi or that any putative class member is entitled to any relief sought herein.

683. Paragraph 683 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

684. Paragraph 684 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

685. Paragraph 685 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

686. Paragraph 686 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

687. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 687 and therefore denies the allegations.

688. Paragraph 688 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

689. Paragraph 689 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

690. Paragraph 690 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

## **VII. ANTITRUST INJURY**

691. Paragraph 691 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

692. Paragraph 692 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

693. Paragraph 693 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

## **VIII. CONTINUING VIOLATION**

694. Paragraph 694 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations in Paragraph 694.

695. Kairoi admits that the Complaint makes certain allegations, but denies those allegations to the extent they include allegations about Kairoi. Kairoi is without sufficient

knowledge or information to form a belief about the truth of the allegations in Paragraph 685 as to any person or company other than Kairoi and therefore denies those allegations.

696. Paragraph 696 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations in Paragraph 696 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 696 as to any person or company other than Kairoi and therefore denies those allegations.

697. Paragraph 697 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations in Paragraph 697 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 697 as to any person or company other than Kairoi and therefore denies those allegations.

698. Paragraph 698 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

699. Kairoi admits that Plaintiffs and the proposed Class purport to seek damages, but deny that Plaintiffs and the proposed Class members were injured by Kairoi or are entitled to any relief from Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 699 as to any person or company other than Kairoi and therefore denies those allegations.

700. Paragraph 700 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 700 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 700 as to any person or company other than Kairoi and therefore denies those allegations.

## **IX. CLAIMS FOR RELIEF**

**COUNT I**  
**Price Fixing in Violation of  
Section 1 of the Sherman Act (15 U.S.C. § 1)**

701. Kairoi incorporates by reference the preceding paragraphs of this Answer in response to the allegations in Paragraph 701.

702. Paragraph 702 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

703. Paragraph 703 contains legal conclusions to which no response is required. To the extent a response is required and Paragraph 703 includes allegations about Kairoi, Kairoi denies the allegations. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 703 as to any person or company other than Kairoi and therefore denies those allegations.

704. Paragraph 704 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies that Plaintiffs and members of the proposed Class have been injured or will be injured by Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 704 as to any person or company other than Kairoi and therefore denies those allegations.

705. Paragraph 705 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations.

706. The allegations in Paragraph 706 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies each and every allegation and legal conclusion set forth in Paragraph 706.

707. The allegations in Paragraph 707 contain legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations in Paragraph 707.

**COUNT II**  
**Violation of State Antitrust Statutes  
(On behalf of Plaintiffs and the Class)**

708. Kairoi incorporates by reference the preceding paragraphs of this Answer in response to the allegations in Paragraph 708.

709. Paragraph 709 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 709 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 709 as to any person or company other than Kairoi and therefore denies those allegations.

710. Paragraph 710 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 710 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 710 as to any person or company other than Kairoi and therefore denies those allegations.

711. Paragraph 711 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 711 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 711 as to any person or company other than Kairoi and therefore denies those allegations.

712. Paragraph 712 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 712 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 712 as to any person or company other than Kairoi and therefore denies those allegations.

713. Paragraph 713 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi admits that Plaintiffs and members of the Proposed Class seek damages, but Kairoi denies the remaining allegations, including that Plaintiffs and members of the Proposed Class are entitled to any relief.

714. Paragraph 714 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 714 to the extent they relate to Kairoi. Kairoi is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 714 as to any person or company other than Kairoi and therefore denies those allegations.

715. Paragraph 715 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 715.

716. Paragraph 716 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 716.

717. Paragraph 717 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 717.

718. Paragraph 718 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 718.

719. Paragraph 719 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 719.

720. Paragraph 720 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 720.

721. Paragraph 721 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 721.

722. Paragraph 722 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 722.

723. Paragraph 723 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 723.

724. Paragraph 724 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 724.

725. Paragraph 725 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 725.

726. Paragraph 726 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 726.

727. Paragraph 727 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 727.

728. Paragraph 728 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 728.

729. Paragraph 729 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 729.

730. Paragraph 730 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 730.

731. Paragraph 731 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 731.

732. Paragraph 732 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 732.

733. Paragraph 733 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations and legal conclusions set forth in Paragraph 733.

734. Paragraph 734 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 734.

735. Paragraph 735 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 735.

736. Paragraph 736 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 736.

737. Paragraph 737 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 737.

738. Paragraph 738 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 738.

739. Paragraph 739 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 739.

740. Paragraph 740 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 740.

741. Paragraph 741 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 741.

742. Paragraph 742 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 742.

743. Paragraph 743 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 743.

744. Paragraph 744 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 744.

745. Paragraph 745 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 745.

746. Paragraph 746 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 746.

747. Paragraph 747 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 747.

748. Paragraph 748 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 748.

749. Paragraph 749 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 749.

750. Paragraph 750 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 750.

751. Paragraph 751 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 751.

752. Paragraph 752 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 752.

753. Paragraph 753 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 753.

754. Paragraph 754 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 754.

755. Paragraph 755 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 755.

756. Paragraph 756 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 756.

757. Paragraph 757 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 757.

758. Paragraph 758 contains legal conclusions to which no response is required. To the extent a response is required, Kairoi denies the allegations set forth in Paragraph 758.

## **X. PRAYER FOR RELIEF**

Kairoi denies any and all allegations contained in Plaintiffs' prayer for relief in Paragraphs A through E, denies that Plaintiffs are entitled to any relief whatsoever, and requests that Plaintiffs take nothing in this suit and that this matter be dismissed with prejudice, with costs and fees awarded to Kairoi.

## **JURY TRIAL DEMANDED**

Kairoi admits that Plaintiffs demand a trial by jury for all of the issues pled that are so triable. However, such a trial is unnecessary as Plaintiffs' claims should be dismissed as a matter of law. In addition, Kairoi denies that Plaintiffs are entitled to a trial by jury to the extent a contractual agreement to arbitrate, to waive a jury trial, or to waive a class action entered into by Plaintiffs or any purported class member precludes trial by jury.

## KAIROI'S DEFENSES

Kairoi sets out its defenses below. Each defense is asserted as to all claims against Kairoi. By setting forth these defenses, Kairoi does not assume the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiffs. Nothing stated herein is intended or shall be construed as an admission that any particular issue or subject matter is relevant to the Plaintiffs' allegations. As separate and distinct defenses, Kairoi alleges as follows:

759. Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

760. Plaintiffs' claims are barred, in whole and/or in part, because Kairoi's actions were not *per se* unlawful.

761. Plaintiffs' claims are barred, in whole and/or in part, because Kairoi's alleged conduct has not unreasonably restrained trade and was lawful, justified, and pro-competitive, constituted bona fide business practices, and was carried out in furtherance of Kairoi's independent and legitimate business interests.

762. Plaintiffs' claims are barred, in whole and/or in part, because Kairoi and other Defendants do not possess market power, individually or collectively, in any relevant market, including the MSAs where Plaintiffs allege Kairoi owns and/or operates multifamily housing properties (the "Kairoi MSAs").

763. Plaintiffs' claims are barred, in whole and/or in part, because there are no anticompetitive effects in any relevant geographic market, including the Kairoi MSAs, and Plaintiffs entered into contracts that do not include any purported overcharge.

764. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs have not defined a proper relevant market for purposes of this action.

765. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs cannot demonstrate the relevant product market should be limited to "the market for the lease of multifamily residential real estate."

766. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs failed to allege a properly defined geographic market.

767. Plaintiffs' claims are barred, in whole and/or in part, because there is no contract, combination, or conspiracy that unreasonably restrains trade.

768. Plaintiffs' claims are barred, in whole and/or in part, because Kairoi has not formed an agreement or exchanged competitively sensitive information in any relevant market, including the Kairoi MSAs.

769. Plaintiffs' claims are barred, in whole and/or in part, because none of Kairoi's alleged actions or omissions that Plaintiffs challenge substantially lessened or otherwise harmed competition within any relevant market, including the Kairoi MSAs.

770. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs have not suffered antitrust injury.

771. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs lack standing, including antitrust standing, to assert their claims.

772. Plaintiffs' claims are barred because any alleged conduct by Kairoi was not the cause, in law or in fact, of any injury Plaintiffs allegedly suffered, and Plaintiffs' alleged losses were not actually or proximately caused by Kairoi.

773. Plaintiffs' claims are barred, in whole and/or in part, because any alleged injury is too remote.

774. Plaintiffs' claim for damages is barred because their alleged damages, if any, are speculative and uncertain, and because of the impossibility of ascertaining and allocating their alleged damages.

775. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs cannot satisfy the prerequisites set forth in Rules 23(a), 23(b)(2), and/or 23(b)(3) of the Federal Rules of Civil Procedure to maintain this action as a class action.

776. Plaintiffs are not entitled to injunctive relief because they have an adequate remedy at law.

777. Plaintiffs fail to allege facts sufficient to support any granting of injunctive relief. Plaintiffs' request for injunctive relief lacks the specificity required by the Federal Rule of Civil Procedure 65.

778. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs are neither typical nor adequate representatives of the class seeking injunctive relief.

779. Plaintiffs' and putative class members' claims are barred, in whole or in part, to the extent Plaintiffs and putative class members entered into a contract that requires arbitration of the claims at issue, requires suit in a different forum, precludes a jury trial, or precludes a class or other representative proceeding.

780. Plaintiffs' claims are barred, in whole and/or in part, by the statute of limitations.

781. Plaintiffs' claims are barred, in whole and/or in part, under *Illinois Brick v. Illinois*, 431 U.S. 720 (1977).

782. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs have failed to reasonably mitigate their damages, and any relief should be reduced accordingly.

783. Plaintiffs' claims are barred, in whole and/or in part, due to their ratification of, and consent to, the alleged conduct they challenge.

784. Plaintiffs are barred, in whole and/or in part, by the Plaintiffs' knowing acquiescence to the alleged conduct they challenge.

785. Plaintiffs' claims are barred, in whole and/or in part, because the injuries alleged by Plaintiffs, to the extent any exist, were caused, in whole or in part, by the conduct of third parties for whom Kairoi was not responsible, through forces in the marketplace over which Kairoi has no control, and/or through acts or omissions on the part of one or more of the Plaintiffs.

786. Plaintiffs' claims are barred, in whole and/or in part, because Kairoi is not liable for the acts of any other Defendant.

787. Plaintiffs' claims are barred, in whole and/or in part, by the doctrines of waiver, laches, estoppel, unclean hands, and in *pari delicto*. Plaintiffs have unreasonably delayed asserting their alleged damages, and such delay has caused prejudice to Kairoi.

788. Plaintiffs' claims are barred, in whole and/or in part, by Defendants' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct, including to the extent Plaintiffs shared information found to be competitively sensitive regarding their rental lease agreements or potential alternative rental lease agreements.

789. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole and/or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

790. Plaintiffs' claims are barred, in whole or in part, to the extent it seeks improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution.

791. To the extent that any actionable conduct occurred, Plaintiffs' claims and those of the putative class are barred to the extent that such conduct was committed by any individual acting ultra vires or beyond the scope of any individual's express or implied authority as an agent or employee of Kairoi.

792. This action may not be maintained as a class action pursuant to Federal Rules of Civil Procedure 23(a) or 23(b)(3) because, without waiving any other arguments, Plaintiffs have not defined a cognizable class or class period, common questions of law or fact common to members of the putative class do not predominate over any questions affecting only individual members, and a class action is not superior to other available methods for fairly and efficiently adjudicating this controversy.

793. Plaintiffs' putative class should be stricken or dismissed because the Plaintiffs are not proper or adequate class representatives and their claims are not representative of the putative class.

794. Some or all of Plaintiffs' state-law claims are barred due to lack of jurisdiction. For instance, the laws of the states cited in Count II of the Complaint are not intended to, and do not,

apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming. Further, many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because Kairoi had no specific intent to impact the commerce of those states. As a result, the application of those state laws to Kairoi's alleged conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue. To the extent the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are barred as improper assertions of extraterritorial jurisdiction, and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

795. Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs, including, without limitation, any claims brought under the laws of Georgia or Pennsylvania.

796. Plaintiffs' state law claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with applicable notice requirements, including, without limitation, any claim brought under the laws of Massachusetts .

797. Kairoi adopts and incorporates by reference any defense, not otherwise expressly set forth herein, that is or will be pleaded by any other Defendant in this action.

798. Kairoi has not knowingly or intentionally waived any applicable defenses, and it reserves the right to assert and rely upon other applicable defenses that may become available or

apparent during discovery in this matter. Kairoi reserves the right to amend or seek to amend its Answer and Affirmative Defenses.

February 5, 2024.

Respectfully submitted,

/s/ Eliot F. Turner

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Counsel for Defendant Kairoi Management, LLC

#### **CERTIFICATE OF SERVICE**

I certify under Local Rule 5.01 that on February 5, 2024, I electronically filed a copy of this document with the Clerk of Court using the Court's CM/ECF system, which will notify all counsel of record of this filing.

/s/ Eliot F. Turner

Eliot F. Turner